


EXHIBIT A

DECLARATION OF SIBEL TOY

1. My name is Sibel Toy. I make this declaration on personal knowledge and pursuant to the provisions of 28 U.S.C. § 1746.
2. Regarding the allegation by Plaintiff in its Complaint that I sold counterfeit Juul products is false.
3. Regarding the allegation by Plaintiff that I have actively participated in a conspiracy to distribute and sell Counterfeit JLI Pods is false.
4. Regarding the allegation by Plaintiff that I have ever worked together with any of the Defendants to manufacture, arrange the manufacture of, and/or sell and otherwise distribute Counterfeit JLI Pods is false.
5. Regarding the allegation of Plaintiff that the alleged Counterfeit JLI Pods share similar characteristics, including, for example, similar typographical errors, incorrect packaging, and similar shapes and sizes is false and meaningless.
6. Joinder is inappropriate because discovery will reveal that Defendants' actions did not arise from the same transaction, occurrence, or series of transactions. Specifically, other than my husband, Ali Toy, who is a Defendant, I do not know any of the other Defendants and I have never actively participated in a conspiracy to distribute and sell Counterfeit JLI Pods. I have never worked together with any of the Defendants to manufacture, arrange the manufacture of, and/or sell and otherwise distribute Counterfeit JLI Pods. Moreover, the allegation of Plaintiff that the alleged Counterfeit JLI Pods share similar characteristics, including, for example, similar typographical errors, incorrect packaging, and similar shapes and sizes is false and meaningless.
7. Plaintiff has no trademark protection that covers any products allegedly sold by me and to the best of my knowledge and belief, I have never sold any of the allegedly "Counterfeit JLI Pods" in Virginia.
8. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 25__th day of November, 2019, in McKinney, Texas.


Sibel Toy, Defendant